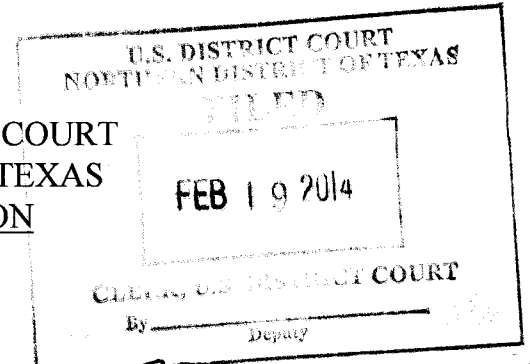


UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:14-MJ-083

WILLIAM BRYANT INMAN, JR. (01)

CRIMINAL COMPLAINT

I, Inspector Keegan Martin, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about November 1, 2013, in the Fort Worth Division of the Northern District of Texas, defendant **William Bryant Inman Jr.** knowingly and with intent to defraud used one or more unauthorized access devices, to wit, three personal checks in the name of D.D., and by such conduct, during a one-year period, obtained approximately \$2,870.13 worth of merchandise from Sam's Club, and by such conduct affected interstate commerce.

In violation of 18 U.S.C. § 1029(a)(2).

1. I am a United States Postal Inspector with the United States Postal Inspection Service, and have been so employed for one year. I am currently assigned to the Mail Theft/Violent Crimes Team for the Fort Worth Division, and I am responsible for investigating mail theft, robberies, burglaries, access device fraud and identity theft cases involving the U.S. Mail.
2. On December 4, 2013, I was contacted by Arlington Police Department ("APD") regarding an unknown suspect stealing outgoing mail from residential mailboxes.

According to the Arlington police report, on or about November 5, 2013, victim Z.C. reported that he placed check number 1125, made payable to First Funding, in the amount of \$2000.83, in his residential mailbox. On or about November 6, 2013, victim Z.C. noticed check number 1125 had been fraudulently negotiated at Sam's Club, in the amount of \$1171.42, in Dallas, Texas. The transaction had been negotiated on the Sam's Club account of victim G.F. Video Surveillance was obtained, which identified a white male negotiating the fraudulent transaction.

3. On December 5, 2013, I was contacted by North Richland Hills Police Department ("NRH PD") regarding an unknown suspect stealing outgoing mail from residential mailboxes. According to the NRH police report, on or about October 31, 2013, victim L.T. reported she placed check numbers 2612, 2613 and 2614 in her residential mailbox. Victim L.T. discovered on November 1, 2013 that check number 2612 was negotiated at Sam's Club in the amount of \$878.61, in Irving, Texas; check number 2613 was negotiated at Sam's Club in the amount of \$1,405.78 in Grapevine, Texas; and check number 2614 was negotiated at Sam's Club in the amount of \$585.74 in Fort Worth, Texas. All three checks were negotiated on the Sam's Club account of victim D.D. Video surveillance was obtained of all three transactions, which identified a white male. Video surveillance also identified the suspect's vehicle as a white Ford Mustang.

4. On December 5, 2013, I contacted APD and NRH PD, as I was able to determine from the Sam's Club video surveillance that the individual in both cases was the same person. On December 9, 2013, NRH PD released images of the unknown male suspect to the media, in an effort to identify the individual.

5. On December 11, 2013, NRH PD received a phone call identifying the unknown male suspect as William Bryant Inman Jr. I compared the still images from the video surveillance to Inman's driver's license photograph. I determined that William Bryant Inman Jr. is the individual seen in the Sam's Club video surveillance.

6. On December 13, 2013, NRH PD received a tip that Inman was residing at the Crosslands Motel in Fort Worth, Texas. Fort Worth Police Department (FWPD) arrested Inman on an outstanding parole violation warrant. Upon arrest, FWPD identified a white Ford Mustang parked outside Inman's motel room. This was the same white Ford Mustang seen in the Sam's Club video surveillance. Additionally, FWPD observed numerous pieces of stolen mail in the motel room addressed to multiple individuals.

7. On December 13, 2013, NRH PD Detectives Whitlock and Cespedes returned to the Crosslands Motel and made contact with Inman's girlfriend, Debra Turner. Turner confirmed the hotel room had been rented in her name and consented for the room being searched. NRH Detectives located multiple pieces of stolen mail, Sam's Club membership cards and identifying information within the motel room.

8. On December 13, 2013, I met with NRH Detectives and inventoried the items seized from Inman's motel room. Included were approximately 100 pieces of U.S. Mail, altered checks, multiple Sam's Club cards bearing Inman's photograph along with the victims' names and numerous personal identifiers.

9. On December 14, 2013, I interviewed Inman at the NRH PD. Inman admitted to driving a white Ford Mustang and stealing U.S. Mail on numerous occasions from residential mail boxes. Inman stated he targeted boxes which had the "red flag" up because "nine out of ten times" there would be outgoing checks. Inman admitted he altered the checks and fraudulently negotiated them, usually at Sam's Club.

Inman stated he would sell the fraudulently purchased merchandise for cash or pawn the items. Inman admitted he opened multiple lines of credit, at Sam's Club and other retailers, using the names of victims he had located in the U.S. Mail. Inman admitted he identified himself as his father, Williams Inman Sr., so he could remove cash from his father's checking account and use his lines of credit. Additionally, Inman discussed how he would search Facebook or conduct credit inquiries, to assist with answering security questions when opening new charge accounts in victims' names.

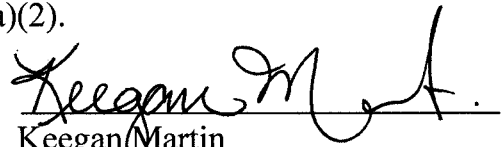
10. On December 14, 2013, I made contact with victim L.L. of Hurst, Texas. L.L. stated there were multiple occasions when he had not received mail at his residence. L.L. mentioned he started to receive notices for lines of credit which he had not applied for, including notification of a purchase at Kay's Jeweler in the amount of \$14,000.00.

Additionally, L.L. stated in November 2013, fraudulent charges in the amount of \$3,023.89 were on his Sam's Club Credit Card ending in 4034. During Inman's interview, he admitted to using victim L.L.'s Sam's Club membership and using L.L.'s personal identifiers to open multiple lines of credit. Inman further stated he searched the internet to identify L.L.'s dogs' name, so he could answer security questions which allowed him to successfully obtain a credit card with a \$7,500.00 limit.

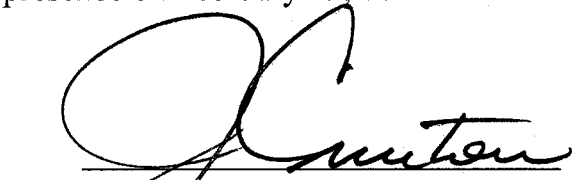
11. On December 14, 2013, I met with victim S.R. of Arlington, Texas. S.R. stated she was approached on June 22, 2013, by an individual who had offered to paint her residential address on the curb of her driveway. S.R. stated the individual identified himself as "William Inman." S.R. stated she paid Inman \$5.00, with check number 3096, for his services. S.R. stated around July 3, 2013, she noticed check number 3096 was negotiated for \$500.00. Victim S.R. provided the carbon copy of check number 3096, which was made payable to "William Inman" in the amount of "five dollars". S.R. was provided a six-person photo spread and positively identified Inman as the individual who presented himself to her as "William Inman" and to whom she issued check number 3096, in the amount of \$5.00.

12. On or about December 16, 2013, I met with FWPD Detective Turner. Turner advised he too was investigating Inman for approximately 11 additional cases where Inman had been identified in video surveillance negotiating victim's checks, which had been stolen from the U.S. Mail.

13. Based upon the foregoing facts and information, I submit there is probable cause to believe that **Inman** has violated 18 U.S.C. § 1029(a)(2).

  
Keegan Martin  
U.S. Postal Inspector

Sworn to before me, and subscribed in my presence on February 19, 2014 at  
3:37 p.m., at Fort Worth, Texas.

  
JEFFREY L. CURETON  
United States Magistrate Judge